

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

ALVIN BALDUS, CINDY BARBERA, CARLENE
BECHEN, RONALD BIENDSEIL, RON BOONE, VERA
BOONE, ELVIRA BUMPUS, EVANJELINA
CLEEREMAN, SHEILA COCHRAN, LESLIE W.
DAVIS III, BRETT ECKSTEIN, MAXINE HOUGH,
CLARENCE JOHNSON, RICHARD KRESBACH,
RICHARD LANGE, GLADYS MANZANET,
ROCHELLE MOORE, AMY RISSEEUW, JUDY
ROBSON, GLORIA ROGERS, JEANNE SANCHEZ-
BELL, CECELIA SCHLIEPP, TRAVIS THYSSEN,

Plaintiffs,

TAMMY BALDWIN, GWENDOLYNNE MOORE
and RONALD KIND,

Intervenor-Plaintiffs,

v.

Members of the Wisconsin Government Accountability
Board, each only in his official capacity:
MICHAEL BRENNAN, DAVID DEININGER, GERALD
NICHOL, THOMAS CANE, THOMAS BARLAND, and
TIMOTHY VOCKE, and KEVIN KENNEDY, Director
and General Counsel for the Wisconsin Government
Accountability Board,

Defendants,

F. JAMES SENSENBRENNER, JR., THOMAS E. PETRI,
PAUL D. RYAN, JR., REID J. RIBBLE,
and SEAN P. DUFFY,

Intervenor-Defendants.

(caption continued on next page)

**DECLARATION OF DOUGLAS M. POLAND IN SUPPORT OF
JOINT EXPEDITED MOTION OF BALDUS PLAINTIFFS AND VOCES DE LA
FRONTERA PLAINTIFFS TO SCHEDULE A HALF-DAY HEARING ON REMEDIES
AND TO SET A COMPLEMENTARY BRIEFING SCHEDULE**

Civil Action
File No. 11-CV-562

Three-judge panel
28 U.S.C. § 2284

VOCES DE LA FRONTERA, INC., RAMIRO VARA,
OLGA WARA, JOSE PEREZ, and ERICA RAMIREZ,

Plaintiffs,

v.

Case No. 11-CV-1011
JPS-DPW-RMD

Members of the Wisconsin Government Accountability
Board, each only in his official capacity:
MICHAEL BRENNAN, DAVID DEININGER, GERALD
NICHOL, THOMAS CANE, THOMAS BARLAND, and
TIMOTHY VOCKE, and KEVIN KENNEDY, Director
and General Counsel for the Wisconsin Government
Accountability Board,

Defendants.

I, Douglas M. Poland, declare, under penalty of perjury and pursuant to 28 U.S.C.

§ 1746, that the following is true and correct:

1. I am an attorney with the law firm of Godfrey & Kahn, S.C., and I am admitted to practice in the State of Wisconsin and in the U.S. District Court for the Eastern District of Wisconsin. I represent plaintiffs in the above-captioned matter. I make this declaration based on my personal knowledge and in support of **Joint Expedited Motion Of Baldus Plaintiffs And Voces De La Frontera Plaintiffs To Schedule A Half-Day Hearing On Remedies And To Set A Complementary Briefing Schedule.**

2. Attached as **Exhibit A** is a true and correct copy of an article appearing in the online edition of the *Wisconsin State Journal* on March 22, 2012
(http://host.madison.com/wsj/news/local/govt-and-politics/on-politics/court-strikes-down-gop-redistricting-orders-just-districts-redrawn/article_f149e054-7429-11e1-a230-0019bb2963f4.html).

3. Attached as **Exhibit B** is a true and correct copy of an article appearing in the online edition of the *Milwaukee Journal-Sentinel* on March 22, 2012 (<http://www.jsonline.com/news/statepolitics/panel-rules-south-side-districts-must-be-redrawn-others-approved-bn4mlpo-143811306.html>).

4. Attached as **Exhibit C** is a true and correct copy of an article appearing on wispolitics.com on March 22, 2012, reprinting a statement by Attorney General J.B. Van Hollen (<http://www.wispolitics.com/index.iml?Article=265043>).

5. Attached as **Exhibit D** is a true and correct copy of an article appearing in the online news edition of 620 WTMJ Newsradio on March 22, 2012 (<http://www.620wtmj.com/news/local/143882636.html>).

I declare under penalty of perjury that the foregoing is true and correct.

Dated: March 23, 2012.

s/ Douglas M. Poland

Douglas M. Poland
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7667771_1

Exhibit A



Court strikes down GOP redistricting, orders just 2 districts redrawn

MARY SPICUZZA | Wisconsin State Journal | mspicuza@madison.com | 608-252-6122 | [@MSpicuzaWSJ](https://twitter.com/MSpicuzaWSJ) | Posted: Thursday, March 22, 2012 6:00 pm

Voting maps for two districts in Milwaukee will have to be redrawn because Republican lawmakers' first attempt violated the federal Voting Rights Act by unfairly weakening Latino voting power, a panel of federal judges ruled Thursday.

But 130 of Wisconsin's 132 newly-drawn state legislative districts are expected to remain largely unchanged. The GOP-friendly maps were drawn by the Republicans who control the Legislature last year and signed into law by Gov. Scott Walker in August.

The three-judge panel slammed Republican lawmakers and the maps' other drafters in its order, saying their comments that the maps were not influenced by partisan factors were "almost laughable," and that the redistricting process was "needlessly secret, regrettably excluding input from the overwhelming majority of Wisconsin citizens."

But ultimately, the panel found the only lines that must be redrawn involve the two south side Milwaukee districts, saying Republicans' first try unfairly hurt Latino voters there by diluting their voting power. The judges found that instead of creating voting districts that kept Latinos in a single bloc and improving their chances of electing Latino candidates, the maps separated them into two different districts. And the panel said that because Assembly Districts 8 and 9 in Milwaukee violate the Voting Rights Act, the state Government Accountability Board cannot implement the new maps in their current form.

That means that unless there is a counter ruling by the U.S. Supreme Court, the GOP-friendly maps will be in place for the next decade. They are set to go into effect in November.

Walker spokesman Cullen Wervie said options for fixing the maps include a special session, an extraordinary session, or the court could redraw those districts. There is also a limited-business floor period from April 24 to May 3.

But Senate Republican Leader Scott Fitzgerald, R-Juneau, said he can't understand why the Legislature would come back for another session to make the minor changes required by the court and vote on the maps.

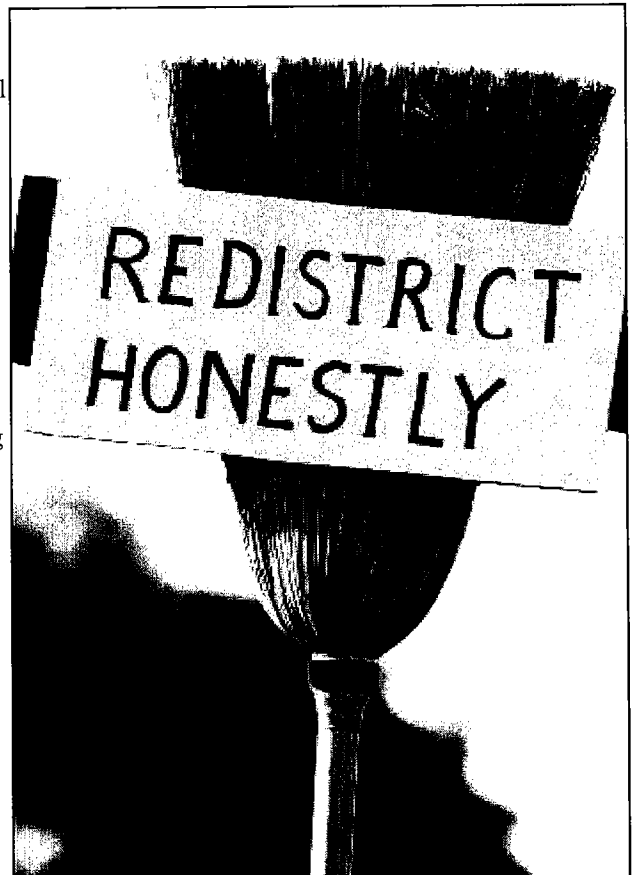
"Why would you go back to the Legislature?" Fitzgerald said.

The judges said their ruling "is not intended to affect any other district" and re-drawing those lines "must occur within the combined outer boundaries of those two districts."

Since the maps passed the Legislature last summer, Republicans lost control of the Senate, which is now split evenly 16-16 after a GOP senator resigned last week.

Election boundaries must be redrawn every 10 years to account for population shifts in an effort to ensure that political districts throughout the state roughly include the same number of voters.

In recent decades, Republican and Democratic state lawmakers in Wisconsin have not been able to agree on maps, and as a result courts have set the boundaries. This time around, Republicans worked quickly to draw GOP-friendly maps after taking



control of the Assembly, Senate and governor's office in January 2011.

Even before Republican lawmakers unveiled their maps last summer, a group of Democratic citizens sued over redistricting in federal court in Milwaukee. Then immigrant rights advocacy group Voces de la Frontera filed another suit. The two cases were consolidated.

They argued the new district lines weakened Latinos' voting power by dividing one Hispanic bloc in Milwaukee into two separate Assembly districts. The panel agreed.

They also said the maps needlessly moved as many as 300,000 voters into new districts, forcing many voters to wait six years, instead of the usual four, before casting ballots in their next state Senate elections, which are staggered. The plaintiffs argued that change violated those voters' rights, but the judges' ruling Thursday — while voicing concerns — did not agree on that charge.

The maps' backers insisted it's impossible to draw maps that please everyone in redistricting, which is a notoriously controversial process. And they said creating two Milwaukee districts with heavy Latino populations would increase their ability to elect two Latinos to the state Assembly rather than just one.

The panel's order repeated that lawmakers, rather than courts, should be the ones to draw the lines. The court battle over the maps had been delayed this spring after the judges urged GOP leaders to revisit the maps, but they refused. The trial took place in late February.

Thursday's judgment was signed by J.P. Stadtmueller, an appointee of President Ronald Reagan, in the U.S. District Court in Milwaukee. It was written by Stadtmueller, Diane P. Wood of the 7th Circuit Court of Appeals and Robert M. Dow Jr. of the Northern District of Illinois. Wood was appointed by President Bill Clinton and Dow by President George W. Bush.

Despite rejecting most of the claims against the new maps, the panel served up some harsh words for Republicans. The judges slammed GOP lawmakers over the secrecy surrounding the redistricting process, noting the maps involved confidentiality agreements that most GOP lawmakers were required to sign, pledging not to publicly discuss the maps.

"Every effort was made to keep this work out of the public eye and, most particularly, out of the eye of the Democrats," they wrote. The judges also noted that while the GOP shut Democrats and most of the public out of the process, "they also held meetings behind closed doors with selected outsiders" like lobbying group Wisconsin Manufacturers and Commerce.

But the Republican state attorney general called it a win for GOP leaders who control the Legislature.

"The judgments made by the Wisconsin Legislature have largely been vindicated," J.B. Van Hollen said. "No constitutional defects were found and what began as a scattershot attack on every aspect of these laws has come down to a single finding that one line between two districts should be adjusted."

Fitzgerald and Assembly Majority Leader Jeff Fitzgerald also called it a vindication and said they were working with the state Department of Justice to explore their options going forward.

But Voces de la Frontera and Democrats also declared victory.

"This is a vindication that we were right," said Christine Neumann-Ortiz, the group's executive director. "If the Republican Party had chosen to honor the public process — instead of operating secretly — there would have been the opportunity for a meaningful discussion and debate."

Voces' attorney Peter Earle said the group would file a petition seeking to have its legal fees paid by the state by April 5.

Democratic lawmakers called on Republicans to make a fresh start.

"They have given the Legislature another chance — and we stand ready to work with the Republicans to draw maps in a transparent, open fashion that respects the citizens of Wisconsin and our communities," said Assembly Minority Leader Peter Barca, D-Kenosha.

Exhibit B



Panel rules south side districts must be redrawn, approves all others

But other maps met requirements of law, U.S. judges rule

By Patrick Marley of the Journal Sentinel
March 22, 2012

Madison - New election maps that Republican state lawmakers drew last year for Milwaukee's south side violated the voting rights of Latinos and must be redrawn, a panel of three federal judges unanimously ruled Thursday.

The court found other maps the Republicans drew met the requirements of federal law and the U.S. Constitution but blocked the state from using any of the maps for the Legislature until changes are made to two Assembly districts in Milwaukee's Hispanic neighborhoods.

Nonetheless, the decision signals that - barring a counter-ruling by the U.S. Supreme Court - the GOP-friendly maps will largely be in place for the next decade, starting in November.

While upholding most of the maps, the court criticized lawmakers for the secretive process they used to draw them, saying it was not in keeping with Wisconsin's history of open government.

"We find that although the drafting of Act 43 was needlessly secret, regrettably excluding input from the overwhelming majority of Wisconsin citizens, and although the final product needlessly moved more than a million Wisconsinites and disrupted their long-standing political relationships, the resulting population deviations are not large enough to permit judicial intervention under the (U.S.) Supreme Court's precedents" for claims other than those involving the two Latino districts, the court wrote.

The three judges found the maps for Assembly Districts 8 and 9 violate the federal Voting Rights Act and said legislators should quickly redraw them. The judges said legislators must not change the maps for other districts as they redraw the two on Milwaukee's south side, but Democrats noted the same court in an earlier ruling said the Legislature has free rein to alter any of the maps.

Who will draw new maps?

Regardless, lawmakers probably won't take up the maps at all, leaving it to the court to set them. Senate Republican leader Scott Fitzgerald of Juneau said there was "not a chance" senators would return to the floor to take up the maps.

Republicans lost their majority in the Senate on Saturday, when Sen. Pam Galloway (R-Wausau) resigned.

Galloway, who was to face a recall election, said she left because of illnesses in her family. Her departure leaves the Senate evenly divided, and both parties would need to agree to come back in session.

The court did not set a timeline for lawmakers to make changes, but observers said maps must be put in place by April 15, when candidates can start circulating nomination papers. Democrats said they want the Legislature to take up the issue and were distressed that Fitzgerald would not agree to return to the floor.

"It is ridiculous that Republicans would ignore a court order to fix an unlawful map. Maybe they should sleep on it," Senate Democratic leader Mark Miller of Monona said in a statement.

"We need to immediately begin to redraw the maps in a manner that is fully open and transparent and does not, in the words of the court, 'needlessly move' more than a million citizens of Wisconsin," Assembly Minority Leader Peter Barca (D-Kenosha) said in a statement.

State says it's vindicated

Republican Attorney General J.B. Van Hollen, who defended the state, hailed the court's decision.

"The judgments made by the Wisconsin Legislature have largely been vindicated," he said in a statement. "No constitutional defects were found and what began as a scattershot attack on every aspect of these laws has come down to a single finding that one line between two districts should be adjusted."

The court's order enjoined the state from implementing the law that created the new 99 Assembly districts and 33 Senate districts, the plaintiffs noted. But Steve Means, Van Hollen's executive assistant, said he thought there was ambiguity in the order and only the two Latino Assembly districts were blocked.

The lawsuit also challenged the makeup of the newly drawn congressional districts, but the court found they were configured in an acceptable way and did not block the use of those maps.

Once every 10 years, states must draw new districts to account for changes in population identified by the U.S. Census Bureau, and how those lines are drawn can give one party tremendous advantage over the other.

In past decades, for the most part, Wisconsin's Republicans and Democrats could not agree on maps and courts established the lines. But last year, Republicans controlled all of state government and approved maps that favored their party.

Even before they revealed their maps, a group of Democratic citizens filed suit over them in federal court in Milwaukee. The immigrant rights group Voces de la Frontera later filed a separate suit, and the two were consolidated.

The plaintiffs contended the Legislature violated the federal Voting Rights Act by diluting the voting power of Latinos by dividing them into two Assembly districts on Milwaukee's south side instead of concentrating them into one, and the court agreed with them.

The group of Democrats argued the maps were also improper because they make too many people wait six years, instead of the usual four, between their chances to vote in a state Senate election.

State senators serve four-year terms, and this fall half of them are up for election, with the other half up in 2014.

Nearly 300,000 people who had lived in a Senate district that is up in 2012 have been moved into ones with elections in 2014. That means they have to wait six years, instead of the usual four, between elections.

The plaintiffs contended that shift violated those voters' constitutional rights and that lawmakers could have minimized the number of affected voters. The court said it was sympathetic to those voters, but the issue did not rise to the level of a constitutional violation.

Judges jab Republicans

The judges took digs at the Republicans throughout their decision, as they have in past rulings. They said they had trouble believing the sworn testimony of Tad Ottman and Adam Foltz, two Republican aides who drew the maps for lawmakers and insisted that partisanship played no role in where the lines were drawn.

"We find those statements to be almost laughable," the court wrote.

The judges - two appointed by Republican presidents and one appointed by a Democratic president - said the maps were clearly motivated by partisanship and contrasted that with the almost even divide in the state between Republicans and Democrats.

"Regrettably, like many other states, Wisconsin chose a sharply partisan methodology that has cost the state in dollars, time and civility," the court wrote. "Nevertheless, our task is to assess the legality of the outcome, not whether it lived up to any particular ideal."

The critique of the Republicans' practices - which included having nearly all GOP lawmakers sign secrecy agreements about the maps - comes after even more scathing rulings. Earlier this year, the panel ordered Republican attorneys to pay about \$17,500 to the plaintiff's attorneys for filing frivolous motions trying to prevent information from becoming public.

The three judges in the case repeatedly have said lawmakers, rather than judges, should be the ones to draw the lines. A trial over the maps was delayed for two days as the judges urged majority Republicans to revisit the maps taking into account the issues raised by Democrats and Latinos. The Republicans declined to reconsider them, and the trial was held in February.

The case appears headed back to court now that Fitzgerald said senators would not return to the floor. That would likely mean attorneys in the case would present maps to the court on how to reconfigure the two Assembly districts. Republicans could be at a disadvantage in that process because the Legislature is not a party to the case, and thus does not have attorneys advocating for it in the courtroom.

Which maps for recalls?

Thursday's ruling could also play a role in looming recall elections of state senators.

The plaintiffs had also asked the court to rule that old maps must be used for those elections, expected this summer. The court said using the old maps for recall elections would be constitutional. The federal panel left the matter to state courts but said it could review any decision on which maps to use.

Two lawsuits have been filed by a group of Republican citizens asking that the new districts be used for recalls,

and those cases have been tied up for months in the state Supreme Court.

Federal redistricting cases are unusual in that they are heard by a three-judge panel. Any appeals go directly to the U.S. Supreme Court, which must rule on them. Both sides said they were considering appealing.

The decision was written by J.P. Stadtmueller of the Eastern District of Wisconsin, Diane P. Wood of the 7th Circuit Court of Appeals and Robert M. Dow Jr. of the Northern District of Illinois. Stadtmueller was appointed by Republican President Ronald Reagan; Wood was appointed by Democratic President Bill Clinton; and Dow was appointed by Republican President George W. Bush.

Thursday's ruling may mean taxpayers have to spend more on legal fees. Voces attorney Peter Earle said he would seek more than \$100,000 in legal fees, and Doug Poland, who represents the Democrats who sued, said he would probably ask for attorneys' fees as well.

Means, of the Department of Justice, said he did not believe they would prevail because the court ruled Thursday that other costs would not be shifted.

Already, Republican lawmakers have committed \$400,000 in taxpayer money to pay for help they sought in drawing the maps from Michael Best & and the Troupis Law Office. Separately, Gov. Scott Walker hired Reinhart Boerner Van Deuren to assist the Department of Justice with the litigation. Its contract with the state caps its fees at \$925,000; as of last month, it had billed the state \$288,000.

Jason Stein of the Journal Sentinel staff contributed to this report.

Find this article at:

<http://www.jsonline.com/new/s/statepolitics/panel-rules-south-side-districts-must-be-redrawn-others-approved-bn4mipo-143811306.html>

☐ Check the box to include the list of links referenced in the article.

Exhibit C

**AG Van Hollen: Statement on redistricting case**

3/22/2012

Contact: Dana Brueck
608/266-1221

MADISON — This morning, the three-judge panel from the Eastern District of Wisconsin (Diane P. Wood, Justice-Seventh Circuit Court of Appeals, J.P. Stadtmueller, District Court Judge-Eastern District of Wisconsin, and Robert M. Dow, Jr., District Court Judge-Northern District of Illinois) issued its decision in *Baldus, et al. v. Brennan, et al.*, Case No. 11 CV 562, and *Voces de la Frontera, Inc. et al. v. Brennan*, Case No. 11 CV 1011, which involved challenges to 2011 Wisconsin Acts 43 and 44. Act 44 established the congressional districts within the State of Wisconsin based on 2010 census data and Act 43 established the state senate and assembly districts.

All challenges to Act 44 were rejected and the newly drawn congressional boundaries were upheld as legal and constitutional. All challenges to the state senate districts created by Act 43 also were rejected and the newly-drawn state senate districts were upheld as legal and constitutional. With respect to the state assembly districts created by Act 43, the Court rejected all constitutional challenges and all other challenges with one exception. The Court held that the plaintiffs were entitled to limited relief under the Voting Rights Act with respect to assembly districts 8 and 9. Although it recognized that Act 43 created “two Latino influence districts,” it found this to be insufficient “because Act 43 fails to create a [single] majority-minority district for Milwaukee’s Latino community.” However, the Court stated that its “holding is not intended to affect any other district drawn by Act 43” and that any “redrawing of the lines for Districts 8 and 9 must occur within the combined outer boundaries of those two districts.”

Attorney General J.B. Van Hollen responded to the decision as follows:

“The judgments made by the Wisconsin Legislature have largely been vindicated. No constitutional defects were found and what began as a scattershot attack on every aspect of these laws has come down to a single finding that one line between two districts should be adjusted. While the intent of the maps was to create two assembly districts where Latino voters were likely to be dominant, the Court concluded that it was better to draw the line so that Latino voters were more concentrated in one of the districts.”

This decision is currently under review. Any appeal would be directly to the United States Supreme Court.

Copies of the Judgment and the Memorandum Opinion and Order are available at the following links:

<http://www.doj.state.wi.us/news/files/opinion-order-03222012.pdf>

<http://www.doj.state.wi.us/news/files/judgment-03222012.pdf>



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Exhibit D



Van Hollen: "I believe it will ultimately be the court that redraws the line"

By Matt Montgomery & WTMJ News Team

CREATED MAR. 22, 2012 - UPDATED: MAR. 22, 2012

MILWAUKEE - A federal panel of three judges have ordered the Wisconsin State Legislature to re-draw two state assembly district borders after Republican lawmakers drew the districts.

The ruling means that the entire newly-drawn election map cannot immediately go into effect. The two new districts (8th and 9th) were ruled to have violated the Voting Rights Act.

Republican Attorney General J.B. Van Hollen joined Wisconsin's Afternoon News with John Mercure to give his perspective on ruling.

John asked Van Hollen about the Court's strong words regarding Act 43, the redistricting act. " (Act 43 was) needlessly secret and regrettably excluded the input from the overwhelming majority of Wisconsin citizens."

Van Hollen told the show, "Our office wasn't involved in redistricting...But none of that came out in their (the Court's) decision. They found none of that to be valid when it came to entering a decision regarding the constitutionality or the legality of those lines."

John then asked how those district maps would get redrawn since the Senate is split in the amount of Democrats and Republicans or would it have to be determined by the courts. "I don't think it will get done by the legislature," said Van Hollen. "I believe it will ultimately be the court that redraws the line."

"The judgments made by the Wisconsin Legislature have largely been vindicated," claimed Wisconsin Republican Attorney General J.B. Van Hollen in a statement. "No constitutional defects were found and what began as a scattershot attack on every aspect of these laws has come down to a single finding that one line between two districts should be adjusted. While the intent of the maps was to create two assembly districts where Latino voters were likely to be dominant, the Court concluded that it was better to draw the line so that Latino voters were more concentrated in one of the districts."

Legislators are required to redraw electoral maps every 10 years.

Find this article at:

<http://www.620wtmj.com/news/local/143882636.html>

☐ Check the box to include the list of links referenced in the article.

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Brandt, Karen J (15243)

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United States District Court

Eastern District of Wisconsin

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Case Number: 2:11-cv-00562-JPS-DPW-RMD
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Docket Text:

DECLARATION of Douglas M. Poland *in Support of Joint Expedited Motion of Baldus Plaintiffs and Voces de la Frontera Plaintiffs to Schedule a Half-Day Hearing on Remedies and to Set a Complementary Briefing Schedule.* (Attachments: # (1) Exhibit A - Wisconsin State Journal article dated March 22, 2012, # (2) Exhibit B - Milwaukee Journal-Sentinel article dated March 22, 2012, # (3) Exhibit C - Wispolitics.com article dated March 22, 2012, # (4) Exhibit D - 620 WTMJ Newsradio article dated March 22, 2012)(Poland, Douglas)

2:11-cv-00562-JPS-DPW-RMD Notice has been electronically mailed to:

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